

PETER SZANTO 949-887-2369
11 Shore Pine
Newport Beach CA 92657

US BANKRUPTCY COURT
DISTRICT OF OREGON

2018 FEB -8 AM 11:50

LOGGED RECD *PS*

PAID FORWARDED

United States Bankruptcy Court

in and for the District of OREGON

1001 SW 5th Av., Portland OR 97204

In Re Peter Szanto, Debtor

Adversarial # 16-ap-3114

core case:16-bk-33185-pcm7

Peter Szanto, Plaintiff

vs.

Notice of Joinder

Evye Szanto, et al,

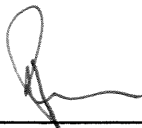
of Indispensable Party

Defendants

Susan Szanto

To the Court and the defendants, please take notice – based on the refreshing of Susan Szanto's memory at her deposition in Santa Ana CA of 1-18-2018, as to horrific damage, massive injuries and despicable emotional harm inflicted upon her by the defendants, Susan Szanto has joined the within action [EXHIBIT A] in the United States District Court in and for the Central District of California. The Honorable United States District Court Judge David O. Carter now presides over this cause in its entirety.

DATED 2-5-2018



Peter Szanto

16-ap-3114

Notice – pg. 1

1
2 **Proof of Service**

3 My name is Maquisha Reynolds, I am over 21 years of age and not
4 a party to the within action. My business address is PO Box 14894,
5 Irvine CA 92623. On the date indicated below, I personally served the
6 within:
7 _____

8 **Notice**

9
10 by e-mail to Mr. Olsen and Mr. Henderson at:

11
12 nhenderson@portlaw.com

13 I declare under penalty of perjury under the laws of the United States
14 that the foregoing is true and correct. Signed at Portland OR.

15
16 Dated 2-5-2018 /s/ Maquisha Reynolds
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FILED

SUSAN SZANTO 949-720-7005
11 Shore Pine
Newport Coast CA 92657

2018 JAN 31 PM 2:13

CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
SANTA ANA

United States District Court
in and for the Central District of California

In Re Peter Szanto,

Debtor and Plaintiff

(in Oregon Bankruptcy Cases

16-bk-33185 and 16-ap-3114)

Santa Ana Division

17-MC-00019 DOC DFM

Notice of Joinder
of Indispensable Party
Susan Szanto

May it please the Court:

DECLARATION of Susan Szanto

1. My name is Susan Szanto; I am over 21 years of age
2. I was previously the non-party whose deposition was sought and whom the Court directed to be deposed.
3. This is my truthful declaration subsequent to said deposition.

17-MC-19

NOTICE - pg. 1

A

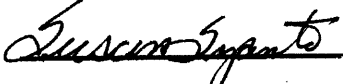
- 1
- 2 4. At said deposition of January 18, 2018 my thoughts, recollections and
- 3 memories were refreshed by the questions asked by the defendants.
- 4 5. With great psychological pain and intense emotional sadness, I recollected
- 5 vividly all of my current, pending and unresolved claims against the
- 6 defendants herein.
- 7 6. During the deposition and the days thereafter, my memories were
- 8 refreshed by consideration of the questioning by the defendants.
- 9 7. I recalled the immense pain and horror the defendants have purposefully
- 10 inflicted upon me during the previous years.
- 11 8. That intense physically pain is continuing now.
- 12 9. I personally obtained a copy of the underlying complainant in this matter.
- 13 10. I concur in, and support, and affirm all of the claims made in that
- 14 complaint.
- 15 11. Upon that ground, I now join this action with plaintiff against the
- 16 defendants.
- 17 12. I know to an absolute certainty that I am an indispensable party in this
- 18 matter because complete adjudication of plaintiff's claims is impossible
- 19 without the adjudication of my same claims against the defendants,
- 20 13. Upon that ground, I now join this action with plaintiff against the
- 21 defendants.
- 22 14. Pursuant to FRCP 19 and supported by FRCP 20(a)(1) I also assert:

23 (A) my right to relief jointly, severally, or in the alternative with respect to or
24 arising out of the same transaction, occurrence, or series of transactions or
25 occurrences as plaintiff; and

1
2 (B) that the questions of law or fact common in plaintiffs action all arise
3 in the action now already before this Court.
4

5 15. I learned only for the first time on January 18, 2018 that my rights and
6 claims are impaired by the defendants and that I am entitled to relief for
7 defendants' actions against me personally based upon this action which is
8 already before this Court.
9

10
11 I declare under penalty of perjury under the laws of the United States
12 that the foregoing is true and correct. Signed at Santa Ana California.
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14
15 January ³¹~~26~~, 2018  Susan Szanto
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25
26 17-MC-19

NOTICE - pg. 3

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2
3 **PROOF OF SERVICE**
4

5 My name is Maquisha Reynolds, I am over 21 years of age and not a party to the
6 within action. My business address is PO Box 14894, Irvine CA 92623. On the date
7 indicated below, I personally served the within:

8 **Notice**
9

10 by enclosing the documents herein in an envelope, sealing said envelope and affixing
11 thereon sufficient 1st Class postage to assure delivery and depositing said envelope into the US
12 Mail addressed as:

13 Motschenbacher Blattner
14 117 SW Taylor St. #300
15 Portland OR 97204
16

17 I declare under penalty of perjury under the laws of the United States that the
18 foregoing is true and correct. Signed at Santa Ana, CA.

19 Dated 1-³¹~~26~~-18 Maquisha Reynolds
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26 17-MC-19

27 NOTICE - pg. 24
28

ORIGIN ID: DTHA (949) 887-2369
SZANTO
SZANTO
P.O. BOX 14894

IRVINE, CA 92623
UNITED STATES US

SHIP DATE: 06FEB18
ACTWGT: 0.50 LB
CAD: 1654958/NET3980

BILL SENDER

EX
press

TO CLERK-DIST OREGON
US BANKRUPTCY COURT PORTLAND
1001 SW 5TH AVE #700
ROOM 700 @ 1001 SW 5TH AV
PORTLAND OR 97204

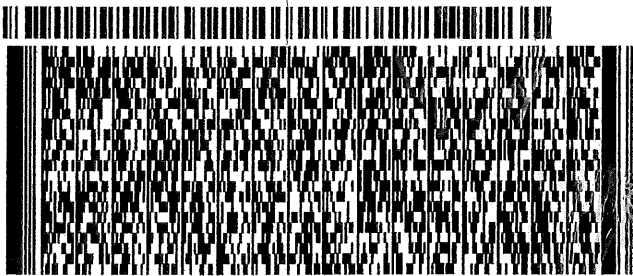
(503) 610-0865

REF:

INV:
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DEPT:

552J1122D/DC45



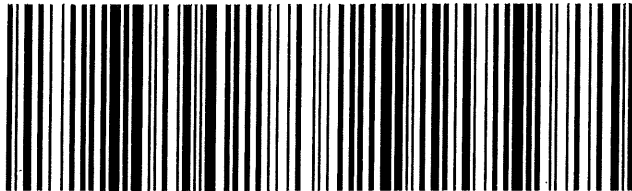
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THU - 08 FEB 4:30P
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Extremely Urgent

CLERK-DIST OREGON

FEB - 8 2018

LOT:
PAID

Case 16-03114-pcm Doc 334 Filed 02/08/18

2/6/2018